

Exhibit C – Declarations by Sheila Fassler, John Fassler, and Pediatric Hair Solutions

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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

LARADA SCIENCES, INC., a Delaware corporation,

Plaintiff,

vs.

PEDIATRIC HAIR SOLUTIONS CORPORATION, a North Carolina corporation, et al.,

Defendants.

**DECLARATION OF SHEILA FASSLER
IN SUPPORT OF DEFENDANTS'
EMERGENCY MOTION TO STAY
JUDGMENT**

Case No. 2:18-cv-00551-RJS-JCB

Chief Judge Robert J. Shelby
Magistrate Judge Jared C. Bennett

I, Sheila Fassler, pursuant to 28 U.S.C. § 1746, do hereby declare, under penalty of perjury under the laws of the United States and the State of Utah, that the following is true and correct:

1. I am an individual defendant in the above-captioned matter and thus, have facts and knowledge of this action, the issues presently presented before this Court, and if called to testify, I could competently do so.

2. I do not have the ability to pay the judgement entered against me on September 26, 2024. I do not have assets or the ability to borrow enough funds to secure a bond for the judgment amount, or any significant portion thereof. If required to post an immediate bond, my husband,

John Fassler, and I would likely need to sell our primary residence, which would cause significant and irreparable harm to me and my family. Any significant payment of a bond to secure a stay to Larada Sciences, Inc.'s efforts to enforce its judgment against me would result in my insolvency.

3. My primary checking account, shared with John Fassler, has a total balance of approximately \$26,341.00.

4. I, along with my husband, John Fassler, own a primary residence located in North Carolina. Our primary residence has an outstanding mortgage balance of approximately \$925,222.00.

5. I, along with John Fassler, own a 50% ownership stake in real property located in Ohio. The approximate value of our combined ownership stake is \$32,500.

6. John Fassler and I have been forced to deplete John's retirement account by approximately \$1,000,000 over the course of the above-captioned lawsuit, leaving approximately \$108,000 remaining.

7. Currently, I believe I am unable to borrow any significant lines of credit to satisfy a bond or judgment.

8. In defending the above-captioned lawsuit, John Fassler, Pediatric Hair Solutions, and I owe approximately \$1,000,000 in legal fees to three different law firms.

I declare under penalty of perjury that the foregoing is true and correct.

DATED January 16, 2025.

DocuSigned by:

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Sheila Fassler

Romaine C. Marshall (9654)
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DISTRICT OF UTAH**

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Plaintiff,

vs.

PEDIATRIC HAIR SOLUTIONS CORPORATION, a North Carolina corporation, et al.,

Defendants.

**DECLARATION OF DR. JOHN
FASSLER IN SUPPORT OF
DEFENDANTS' EMERGENCY MOTION
TO STAY JUDGMENT**

Case No. 2:18-cv-00551-RJS-JCB

Chief Judge Robert J. Shelby
Magistrate Judge Jared C. Bennett

I, Dr. John Fassler, pursuant to 28 U.S.C. § 1746, do hereby declare, under penalty of perjury under the laws of the United States and the State of Utah, that the following is true and correct:

1. I am an individual defendant in the above-captioned matter and thus, have facts and knowledge of this action, the issues presently presented before this Court, and if called to testify, I could competently do so.

2. I do not have the ability to pay the judgement entered against me on September 26, 2024. I do not have assets or the ability to borrow enough funds to secure a bond for the judgment amount, or any significant portion thereof. If required to post an immediate bond, my wife, Sheila

Fassler, and I would likely need to sell our primary residence, which would cause significant and irreparable harm to me and my family. Any significant payment of a bond to secure a stay to Larada Sciences, Inc.'s efforts to enforce its judgment against me would result in my insolvency.

3. I, along with my wife, Sheila Fassler, own a primary residence located in North Carolina. Our primary residence has an outstanding mortgage balance of approximately \$925,222.00.

4. I, along with Sheila Fassler, own a 50% ownership stake in real property located in Ohio. The approximate value of our combined ownership stake is \$32,500.00.

5. My primary checking account, shared with Sheila Fassler, has a total balance of approximately \$26,341.00.

6. I have been forced to deplete my retirement account by approximately \$1,000,000 over the course of the above-captioned lawsuit, leaving approximately \$108,000 remaining.

7. As of January 16, 2025, I have an outstanding automobile loan balance of approximately \$24,230.00.

8. As of January 16, 2025, I have seven credit cards, with a total outstanding balance of approximately \$27,790.00 and a collective available credit totaling approximately, \$19,147.00. I have access to approximately \$8,587.00 in additional lines of credit. I believe I am unable to borrow any additional significant lines of credit to satisfy a bond or judgment.

9. In defending the above-captioned lawsuit, Sheila Fassler, Pediatric Hair Solutions, and I owe approximately \$1,000,000 in legal fees to three different law firms.

I declare under penalty of perjury that the foregoing is true and correct.

DATED January 16, 2025.

DocuSigned by:

John Fassler
Dr. John Fassler
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EMERGENCY MOTION TO STAY
JUDGMENT**

Case No. 2:18-cv-00551-RJS-JCB

Chief Judge Robert J. Shelby
Magistrate Judge Jared C. Bennett

I, Sheila Fassler, pursuant to 28 U.S.C. § 1746, do hereby declare, under penalty of perjury under the laws of the United States and the State of Utah, that the following is true and correct:

1. I am an individual defendant in the above-captioned matter and thus, have facts and knowledge of this action, the issues presently presented before this Court, and if called to testify, I could competently do so.
2. I am the owner of defendant Pediatric Hair Solutions Corporation (“PHS”).
3. PHS does not have the ability to pay the judgment entered against it on September 26, 2024. PHS does not have assets or the ability to borrow enough funds to secure a bond for the

judgment amount, or any significant portion thereof. If required to pay an immediate bond, PHS will likely become completely insolvent, and likely cease to exist as a business.

4. As of December 31, 2024, PHS has a total current balance of \$466.59 in cash.

5. As of December 31, 2024, PHS' total liabilities equaling \$1,477,584.40, including \$350,354.01 in long-term liabilities, of which, \$279,500.00 is in the form of a Small Business Loan, and \$1,127,230.39 in current liabilities, of which \$999,595.61 is in the form of a Shareholder Loan and \$127,628.07 is in the form of outstanding credit card balances.

6. As of December 31, 2024, PHS has assets totaling \$910,325.32. However, this includes \$888,709.83 in accounts receivable as prepaid attorney fee expenses by PHS for the defense of this lawsuit. The total value of PHS' fixed assets is \$2,735.82.

I declare under penalty of perjury that the foregoing is true and correct.

DATED January 16, 2025.

DocuSigned by:

Sheila Fassler
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